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BEFORE THE
ILLINOIS COMMERCE COMMISSION

JEREMY M. LARAMORE)	DOCKET NO.
-vs-)	11-0677
ILLINOIS-AMERICAN WATER COMPANY)	
)	
Complaint as to service in)	
Belleville, Illinois.)	

Springfield, Illinois
Wednesday, January 18, 2012

Met, pursuant to notice, at 11:00 a.m.

BEFORE:

MR. LARRY JONES, Administrative Law Judge

APPEARANCES:

MR. JEREMY M. LARAMORE
41 Sierra Drive
Glen Carbon, Illinois 62034

(Appearing pro se)

SULLIVAN REPORTING COMPANY, by
Carla J. Boehl, Reporter
CSR #084-002710

1 APPEARANCES: (Continued)

2 MR. KENNETH C. JONES
3 Corporate Counsel
4 Illinois-American Water Company
5 300 North Water Works Drive
6 Belleville, Illinois 62223

7 (Appearing via teleconference on
8 behalf of Illinois-American
9 Water Company)

10 MR. MATTHEW L. HARVEY
11 Office of General Counsel
12 Illinois Commerce Commission
13 160 North LaSalle Street, Suite C-800
14 Chicago, Illinois 60601-3104

15 (Appearing via teleconference on
16 behalf of Staff witnesses of the
17 Illinois Commerce Commission)

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3	<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
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13		<u>EXHIBITS</u>			
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PROCEEDINGS

JUDGE JONES: Good morning. I call for hearing Docket Number 11-0677. This is titled in part Jerry M. Laramore versus Illinois-American Water Company, complaint as to service in Belleville, Illinois. At least that is how the case is styled on e-Docket.

At this time we will take the appearances orally for the record. When you do so, you need not restate your address and phone number unless it has changed or you simply want to do that. We will start with the appearance on behalf of Mr. Laramore, the complainant. Mr. Laramore, would you identify yourself for the record, please.

MR. LARAMORE: Thank you, Judge. My name is Jeremy M. Laramore.

JUDGE JONES: All right. Thank you, sir. We will now take the appearance or appearances on behalf of Illinois-American Water Company.

MR. JONES: Thank you, Your Honor. Kenneth C. Jones for Illinois-American Water Company.

1 JUDGE JONES: Thank you.

2 Commission Staff?

3 MR. HARVEY: Appearing for the Staff of the
4 Illinois Commerce Commission, Matthew L. Harvey with
5 address as previously stated. I understand that
6 present in open court today is Mr. Smith from the
7 Accounting staff.

8 JUDGE JONES: He is. Thank you.

9 Are there any other appearances to be
10 entered at this time?

11 (No response.)

12 Let the record show there are not.

13 As everybody is obviously aware, there
14 was a prehearing conference on an earlier date. Some
15 scheduling was put into place at that time primarily
16 regarding some data requests or formal discovery. We
17 will check on the status of that in just a minute.

18 Before I do that, I will check with
19 the parties to see if you would like any time among
20 yourselves to discuss further scheduling in this
21 docket. If you want that, we will go off the record
22 for that purpose and you will be given that

1 opportunity among yourselves. And if not, we will
2 simply proceed with scheduling on the record.

3 Does anyone like some time among
4 yourselves to discuss further scheduling?

5 MR. JONES: Your Honor, I think it would be
6 fine just to go ahead on the record and discuss the
7 schedule, unless Mr. Laramore would like to discuss
8 off the record.

9 MR. LARAMORE: I don't have anything.

10 JUDGE JONES: Okay, thank you.

11 Probably one other thing I should have
12 mentioned a minute ago, since we have several persons
13 participating by telephone, if you could identify
14 yourself before you speak, unless a question is
15 directed specifically to you, that would help our
16 court reporter attribute your comments or questions
17 to the speaker.

18 All right. As noted at the prehearing
19 conference, there was some scheduling put into place.
20 Some dates were provided for the submission of data
21 requests and responses to data requests. Whether
22 Mr. Laramore or Illinois-American would be submitting

1 data requests to each other was an option, but
2 whether such requests were actually submitted was
3 left to the parties themselves. That said, I will
4 check with the parties to see what the status of that
5 is at this time.

6 Mr. Laramore, did you send any data
7 requests to Illinois-American?

8 MR. LARAMORE: No, Judge, I did not.

9 JUDGE JONES: Thank you, sir.

10 And, Mr. Jones, did you send any data
11 requests to Mr. Laramore?

12 MR. JONES: Yes, I did, Your Honor. I sent
13 three, I believe, and Mr. Laramore responded in the
14 time that was scheduled, within the time that was
15 scheduled.

16 JUDGE JONES: Thank you.

17 MR. HARVEY: Your Honor, this is Matt Harvey.
18 Insofar as you are interested, Staff did not issue
19 discovery in this matter.

20 JUDGE JONES: All right. Thank you,
21 Mr. Harvey.

22 Do the parties have anything else to

1 say about data requests before we move on?

2 (No response.)

3 All right. Let the record show they
4 do not, at least at this time.

5 All right. In terms of further
6 scheduling, first I will ask have the parties had any
7 communications among yourselves in terms of what you
8 believe should happen next from a scheduling
9 standpoint?

10 MR. JONES: For Illinois-American, Your Honor,
11 no, we have not.

12 MR. LARAMORE: This is Jeremy Laramore. I have
13 not, either.

14 JUDGE JONES: All right. Thank you.

15 All right. We will go ahead and take
16 a look at future further scheduling at this time.
17 Since we have not only Mr. Laramore and
18 Illinois-American in the casee but also the
19 Commission Staff, I would direct a question to
20 Mr. Harvey.

21 Mr. Harvey, do you envision Staff
22 participating in the testimony filing process in this

1 docket at some juncture?

2 MR. HARVEY: It is possible, Your Honor. I
3 wouldn't characterize it as likely, but in all
4 fairness, I haven't had an opportunity to discuss
5 that in any great detail with Mr. Smith. So it is
6 not a possibility that I would want to foreclose at
7 this point but, that said, I wouldn't view it as
8 highly probable.

9 JUDGE JONES: But are you suggesting that some
10 sort of opportunity for participation be built into
11 the schedule, any scheduling that is put into effect
12 today?

13 MR. HARVEY: I think it probably wouldn't hurt,
14 Your Honor. The drop dead date on this case appears
15 to be October 7, so I don't think there is any harm
16 in that.

17 JUDGE JONES: All right. So in terms of where
18 Staff testimony would sort of fit into the schedule,
19 if Staff elects to file any, where do you see that --
20 where would you see that occurring in terms of the
21 sequencing?

22 MR. HARVEY: I would see that as potentially

1 being in the, I suppose, rebuttal phase. I wouldn't
2 anticipate Staff would necessarily -- well, let me
3 take a step back from that, Your Honor.

4 I would assume that you will want the
5 complainant to go first, Illinois-American to go
6 next.

7 JUDGE JONES: Well, let's sort of step aside
8 from whatever I might be assuming. I am trying to
9 figure out where you would see Staff sort of fitting
10 into the sequence there, if you decide to file
11 anything. Are you suggesting that it would work best
12 in this docket, anyway, if Staff would step in, if at
13 all, after the Illinois-American testimony itself?

14 MR. HARVEY: I think that might prejudice the
15 Company, Your Honor. I think probably what we want
16 to do is be responsive to anything. So, you know,
17 let's say for the sake of argument that you wanted
18 Mr. Laramore to go first, you know, in light of the
19 fact that he is the complainant. You know, I think
20 we would probably take whatever date that was set
21 for, you know, the Company's response and take that
22 as well.

1 JUDGE JONES: All right. So one option you
2 would see there would be that whatever date is, is
3 assigned for the Company's testimony filing, that
4 would also be for the Staff filing?

5 MR. HARVEY: And alternatively if you wanted
6 simultaneous filings, we would, you know, in light of
7 the fact that there is both a complaint and the
8 answer on file, I think, you know, we would probably,
9 you know, that would work as well.

10 JUDGE JONES: I am sorry. I am kind of -- what
11 was that latter idea?

12 MR. HARVEY: Well, I mean, another possibility,
13 Your Honor, is that it appears that there are both --
14 there is, you know, both a complaint and an answer on
15 file that seem to pretty squarely frame the issues.
16 And that being the case, there may be no prejudice to
17 anybody if the, you know, assuming that the Company
18 agrees to this in light of the fact that the
19 complainant has the burden, that everybody goes
20 simultaneously.

21 JUDGE JONES: Everybody being?

22 MR. HARVEY: Any party that wishes to file

1 testimony.

2 JUDGE JONES: Oh, you are saying one other
3 option would be for Mr. Laramore, Illinois-American
4 and Staff to have a simultaneous sort of initial
5 testimony filing date.

6 MR. HARVEY: That is correct, Your Honor.

7 JUDGE JONES: Oh, I see what you are saying.

8 MR. HARVEY: I mean, it appears that the issues
9 have been framed by the complaint and the answer, and
10 I am speaking just from my review of those documents
11 and obviously that doesn't reflect any agreement
12 amongst the parties.

13 JUDGE JONES: All right. And if that -- let's
14 just assume for a moment that that happened without
15 saying it will or will not, would you then envision
16 sort of a simultaneous responsive testimony filing
17 date available to anybody that wanted to respond to
18 other parties' previous filing?

19 MR. HARVEY: Yes, Your Honor. I think that
20 would be --

21 JUDGE JONES: I see. So I see what you are
22 saying there. That scenario would involve two filing

1 dates, the first available to Mr. Laramore, also
2 Illinois-American and also Commission Staff. And
3 then the next round would involve sort of a
4 responsive simultaneous filing date where all three
5 of you would have the opportunity then to respond to
6 what you saw in each other's initial filing.

7 MR. HARVEY: Yeah, I mean, that would seem to
8 reduce the possibility of anybody being prejudiced.

9 JUDGE JONES: All right. Well, let's take a
10 look at that and we will see how that sounds to
11 Mr. Laramore and Mr. Jones on behalf of
12 Illinois-American.

13 First of all, with respect to that
14 scenario that Mr. Harvey has outlined as a
15 possibility here, does anybody have a question about
16 how that would work?

17 (No response.)

18 All right. Let the record show --

19 MR. JONES: Your Honor, this is Ken Jones.

20 JUDGE JONES: Yes, sir.

21 MR. JONES: For Illinois-American. I
22 understand how it would work and I wouldn't say I

1 would be vehemently opposed to that, but my
2 preference would be more for Mr. Laramore to file
3 first. And we wouldn't need a long time to file
4 responsive testimony, you know, but -- no more than
5 two weeks later would be fine. But I would prefer to
6 see complainant's testimony first before responding.

7 JUDGE JONES: Where do you see Staff fitting
8 into that -- into the process you just outlined?
9 Because one of the things I think Mr. Harvey was
10 considering there was that there may be three filers
11 here. We are trying to come up with a way to give
12 everyone an opportunity to make a filing and then
13 respond to everybody else's filing.

14 If we went with a different approach,
15 we would have to figure out how the Staff filing or
16 filings would fit into the sequence of filings and
17 then also whether, if you are wanting Mr. Laramore to
18 have to go first, whether then he would also have the
19 opportunity to go last.

20 So how do see your proposal working
21 with those considerations, Mr. Jones?

22 MR. JONES: Yes, thank you, Your Honor.

1 I could foresee Staff filing together
2 with Mr. Laramore initially at the same time.

3 JUDGE JONES: Has that ever been done,
4 Mr. Harvey, to your knowledge? Has Staff ever filed
5 simultaneously with the complainant and/or petitioner
6 and others go after that unless Staff was actually in
7 the case involving a citation or investigation?

8 MR. HARVEY: If it has, Your Honor, I am not
9 aware of it. I mean, maybe in some rulemakings or
10 something like that, but.

11 JUDGE JONES: All right. Why don't you -- what
12 Mr. Harvey is saying is that would be atypical for
13 Staff to file simultaneously with the complainant in
14 advance of the Company making its filing. But having
15 heard Mr. Harvey say that, Mr. Jones, why don't you
16 go ahead and outline the rest of your proposal as you
17 see it working.

18 MR. JONES: Thank you, Your Honor.

19 Well, I could see Mr. Laramore file
20 and then, say, two weeks later the Company respond
21 and then two weeks or so after that, you know, if
22 Mr. Laramore wanted to file surrebuttal or other

1 responsive testimony, and Staff also if they have a
2 response to the Company's filing.

3 JUDGE JONES: All right. Let me take a look at
4 that. So what you are there or putting out for
5 consideration would involve a filing by Mr. Laramore
6 followed by a filing by Illinois-American and then
7 the next filing date would be a responsive filing by
8 Mr. Laramore and a filing by the Commission Staff?
9 Is that how that would work?

10 MR. JONES: Correct, Your Honor.

11 JUDGE JONES: Then how about after that? Would
12 there be any more filings or would Mr. Laramore have
13 an opportunity to respond to the Commission Staff or
14 how do you see that?

15 MR. JONES: Well, if -- that would be Staff's,
16 that second filing.

17 MR. HARVEY: Well, I mean -- I am sorry, please
18 proceed, Mr. Jones.

19 MR. JONES: I mean, assuming Staff had already
20 filed either with Mr. Laramore or with the Company,
21 you know, I am not sure that there would be a need
22 for Mr. Laramore to respond.

1 JUDGE JONES: To Staff?

2 MR. JONES: To Staff, correct.

3 JUDGE JONES: Why is that? Why do you think

4 Mr. Laramore would not have a need to respond to

5 Staff?

6 MR. JONES: Because he would already have had

7 the ability to respond to Staff's first filing.

8 JUDGE JONES: Well, I think what -- as I

9 understand what you were saying -- well, let's back

10 up a minute. Maybe I misunderstood you a minute ago.

11 The first filing date would apply to

12 Mr. Laramore, is that correct?

13 MR. JONES: Yes.

14 JUDGE JONES: All right. Then the second

15 filing date would apply to Illinois-American?

16 MR. JONES: Correct, Your Honor.

17 JUDGE JONES: All right. Now, the third filing

18 date would apply to Mr. Laramore responding to

19 Company. It would also involve a Staff filing to

20 Mr. Laramore and to the Company, is that right or am

21 I missing --

22 MR. JONES: Correct, Your Honor. But I think

1 Staff would have -- Staff would have the opportunity
2 to file either with Mr. Laramore or with the Company.

3 JUDGE JONES: Either but not both?

4 MR. JONES: Yes.

5 JUDGE JONES: Mr. Harvey, do you have anything
6 to -- let me back up.

7 What if Staff would elect to file with
8 Mr. Laramore? Then if that happens, what if
9 Mr. Laramore wanted to respond to Staff?

10 MR. JONES: I would not oppose, Your Honor, Mr.
11 Laramore filing a response. But I do agree with
12 Mr. Harvey that I don't think the case is that
13 complicated and I think the facts are pretty well
14 known to all the parties at this point.

15 JUDGE JONES: Mr. Harvey -- Mr. Laramore, we
16 will get back to you in a minute, but I thought it
17 might be useful to get a couple proposals on the
18 table here from a scheduling standpoint. But before
19 we approve anything, we will make sure that you have
20 a chance to weigh in.

21 Mr. Harvey, Mr. Jones has sort of
22 outlined a proposal himself. Do you have any

1 thoughts on that?

2 MR. HARVEY: Well, I think Staff would have a
3 certain amount of difficulty with the concept of
4 filing at the same time as the complainant primarily
5 because, you know, Staff hasn't been an integral
6 party in this proceeding and doesn't have any burden.
7 You know, I think that we, insofar as we participate
8 in these cases, we do want to see what sort of proof
9 somebody is going to put on before we respond to it.
10 And I don't see how we can really responsibly do that
11 without seeing the complainant's filing first.

12 So, you know, I think if I had to
13 state a preference with respect to the schedules that
14 Mr. Jones described, it would be my preference that
15 the Staff file simultaneously with the Company.

16 JUDGE JONES: Let me look at one of the
17 scheduling options that Mr. Jones was discussing. If
18 Mr. Laramore goes first, say filing in the first
19 filing date and then the second filing date the
20 Company would file, then on the -- would there be a
21 problem in anyone's view if Staff made a filing after
22 those first two filings with the final filing be made

1 by Mr. Laramore if he chooses to make a second
2 filing?

3 In other words, Mr. Laramore would go
4 first, as Mr. Jones is urging. Then
5 Illinois-American would go next and then after that
6 would be Commission Staff and then after that would
7 be Mr. Laramore, if he wants to do so. That's a
8 slightly different version of what Mr. Jones was
9 outlining. It may have elements that one or more
10 parties are not too comfortable with under the
11 circumstances. But let's see about that. I am not
12 promoting that, just looking at some variations here
13 that might be workable.

14 Let me start with you, Mr. Jones.
15 Would you have a problem with that sort of
16 sequencing: Mr. Laramore, Illinois-American, next
17 Commission Staff, next Mr. Laramore if he wants to
18 make a rebuttal filing? Do you have a problem with
19 that one?

20 MR. JONES: No, Your Honor, with one
21 modification. If the Company wished to respond also
22 to Staff, I would like the opportunity to file

1 simultaneously with Mr. Laramore when he files his
2 response.

3 JUDGE JONES: Well, if you want Mr. Laramore to
4 go first, do you not think he should have the
5 opportunity to go last? You have been somewhat
6 insistent that he go first, but some of the schedules
7 that you outlined do not seem to allow him to go
8 last, at least in terms of being able to respond to
9 everything that has occurred before that. So we are
10 into maybe a fourth or fifth variation of these
11 schedules here.

12 MR. JONES: I am fine, Your Honor, with --

13 JUDGE JONES: For purposes of providing an
14 opportunity to discuss this off the record, we hereby
15 go off the record.

16 (Whereupon there was then had an
17 off-the-record discussion.)

18 JUDGE JONES: Back on the record.

19 Let the record show there was an
20 off-the-record discussion for the purposes indicated.
21 As noted before we went off, there were several
22 scheduling alternatives that were under discussion

1 but during the off-the-record discussion, in the
2 spirit of cooperation, the parties have agreed to a
3 scheduling approach with some specific dates to be
4 used in this proceeding. As with some other
5 scheduling approaches, it involves some trade-offs
6 for the parties but does have the benefit of being an
7 agreed-to schedule and not one that would have to be
8 determined on a contested basis.

9 So I believe that the approach for
10 which there is agreement or at least no objection is
11 a version of the one advanced by Mr. Harvey on the
12 record this morning and that would involve two
13 simultaneous filing dates.

14 Is that right, Mr. Harvey?

15 MR. HARVEY: That is correct, Your Honor. And
16 for the benefit of the record, those filing dates
17 would be February 15 for all parties' direct
18 testimony, March 1 for rebuttal testimony. Further
19 scheduling would be March 6 at 11 o'clock to convene
20 a status hearing and an evidentiary hearing on March
21 14 at a time, I guess, that is convenient to the
22 Court.

1 JUDGE JONES: Okay, thank you.

2 Do each of those two simultaneous

3 filing dates apply to Staff, Company and complainant

4 filings?

5 MR. HARVEY: That's consistent with my

6 understanding, Your Honor.

7 JUDGE JONES: And by testimony filing dates,

8 that would include testimony as well as any

9 documentation that the filer was intending to put

10 into the record?

11 MR. HARVEY: That is my understanding as well,

12 Your Honor.

13 JUDGE JONES: All right. And does anyone have

14 any objection to the testimony filing portion of that

15 being in either Q and A form or narrative or

16 statement form?

17 MR. JONES: No objection from the Company, Your

18 Honor.

19 MR. HARVEY: Nor from Staff, Your Honor.

20 MR. LARAMORE: No objection from Mr. Laramore.

21 JUDGE JONES: All right. Thank you. So that

22 would be permissible, that is to use narrative form

1 or statement form, instead of Q and A form.

2 So that schedule would involve the
3 three simultaneous filings on that first date and
4 then three responsive filings for those who wish to
5 make them on that second date. The status hearing
6 March 6 would be one at which participation by
7 telephone will be permitted.

8 On that note I would like to thank
9 Mr. Jones for supplying the call-in number that was
10 used for today's status hearing. I would also note
11 that -- let me back up a minute.

12 Are there any points of clarification
13 or objection with regard to the scheduling just read
14 into the record?

15 MR. JONES: No, not from the Company, Your
16 Honor.

17 JUDGE JONES: All right. Let the record show
18 there are no objections. That scheduling is hereby
19 put into place for purposes of this proceeding.

20 Again, thanks to the parties for your
21 efforts in arriving at an agreed-to scheduling
22 approach and dates.

1 I would also note that, just because
2 there is a full schedule being put into the record
3 today with some filing dates and so on, that does not
4 mean parties are precluded or discouraged from
5 attempting to resolve any issues in this proceeding.
6 And in that context I am referring more to the
7 complainant, Mr. Laramore, and Illinois-American
8 Water Company. We always encourage complainants and
9 respondents to discuss their differences even on into
10 a case. And there are many cases that have been
11 resolved by agreement before they go to evidentiary
12 hearing, and there are others that are not resolved
13 and they do go to hearing.

14 Mr. Harvey, did you have a comment you
15 wanted to make for the record with regard to what you
16 would like to see happen in the event that
17 Mr. Laramore and Illinois-American through Mr. Jones
18 do come to agreement on a settlement in this case?

19 MR. HARVEY: Yes, Your Honor. Obviously, the
20 Staff would encourage any such negotiations and would
21 not stand in the way of any settlement, any lawful
22 settlement, that the parties were able to conclude.

1 We would merely request that we be advised that the
2 parties have concluded a settlement immediately upon
3 their having done so, so that we don't do any extra
4 work that is unnecessary.

5 JUDGE JONES: Is that acceptable to you,
6 Mr. Jones?

7 MR. JONES: Yes, thank you, Your Honor.

8 JUDGE JONES: All right. There was also some,
9 I guess, some possibility that Illinois-American
10 maybe filing a so-called dispositive motion at some
11 point. Is that under consideration, Mr. Jones?

12 MR. JONES: Yes, Your Honor, but if I may add
13 with the schedule being rather short, you know, it
14 might be better just to submit that with any
15 post-hearing briefing schedule that is entered.

16 JUDGE JONES: And in terms of the timing of
17 that, if such a motion is under consideration, it is
18 something that could probably be taken up at that
19 status hearing if there is some benefit to doing it
20 at that time.

21 Does anybody have anything -- any
22 other parties have anything to say about the timing

1 of any so-called dispositive motions at this time?

2 MR. HARVEY: Nothing from Staff, Your Honor.

3 JUDGE JONES: All right. Thank you.

4 Also, just briefly, those so-called
5 testimony filings on February 15 and March 1, which
6 as noted would include any documentation to be
7 offered as well, are to be served electronically,
8 that is by e-mail, on other parties and on me. The
9 actual filing to be made itself with the Commission
10 could be made either on e-Docket or through other
11 types of mail.

12 All right. Before we conclude, let me
13 make sure there are no other questions about anything
14 we have done today. Do any of the parties have any
15 questions or points of clarification with regard to
16 any of the above?

17 MR. HARVEY: Nothing from Staff, Your Honor.

18 MR. JONES: Nothing from the Company, Your
19 Honor.

20 MR. LARAMORE: The only one I have a
21 clarification on is I would have a chance to respond
22 to any motions filed, would that be correct?

1 JUDGE JONES: Yes. If any such motion is
2 filed, you would have the opportunity to respond to
3 that and that would be discussed potentially at that
4 status on March 6. But regardless of whether it is
5 or is not discussed on that date, if there is a
6 motion of that nature filed by Illinois-American,
7 you, Mr. Laramore, would definitely have an
8 opportunity to respond to that.

9 MR. LARAMORE: Okay. That's all I need
10 clarified on. Thank you very much, Your Honor.

11 JUDGE JONES: You are welcome. Anything else?

12 MR. HARVEY: Nothing from Staff, Your Honor.

13 JUDGE JONES: At this time let the record show
14 that today's status hearing is over. Thanks to the
15 parties for your participation and cooperation. At
16 this time let the record show that in accordance with
17 the scheduling discussed above, this matter is
18 continued to a status hearing on March 6 at the hour
19 of 11 a.m., at which participation by telephone will
20 be permitted.

21 (Whereupon the hearing in this
22 matter was continued until March
6, 2012, at 11:00 a.m. in
Springfield, Illinois.)